



# AE Order Number Banner

## Report Description

This report shows an AE Order Number in Barcode format for purposes of scanning. The Barcode format is Code 39.



**App Number:** pCS1716529360

**144B - 15943**

**Williams Four Corners, LLC**

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources  
Department  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-144  
Revised June 6, 2013

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOCD District Office.  
For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

15943

Pit, Below-Grade Tank, or  
Proposed Alternative Method Permit or Closure Plan Application

- Type of action:  Below grade tank registration  
 Permit of a pit or proposed alternative method  
 Closure of a pit, below-grade tank, or proposed alternative method  
 Modification to an existing permit/or registration  
 Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method

**Instructions:** Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request

Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1.  
Operator: Williams Four Corners LLC OGRID #: \_\_\_\_\_  
Address: 1755 Arroyo Drive, Bloomfield, NM 87413  
Facility or well name: 32-8#2 CDP Produced Water BGT (2)  
API Number: \_\_\_\_\_ OCD Permit Number: \_\_\_\_\_  
U/L or Qtr/Qtr SENW (F) Section 27 Township 32N Range 8W County: San Juan County  
Center of Proposed Design: Latitude 36.956897 Longitude -107.664022 NAD:  1927  1983  
Surface Owner:  Federal  State  Private  Tribal Trust or Indian Allotment

2.  
 **Pit:** Subsection F, G or J of 19.15.17.11 NMAC  
Temporary:  Drilling  Workover  
 Permanent  Emergency  Cavitation  P&A  Multi-Well Fluid Management Low Chloride Drilling Fluid  yes  no  
 Lined  Unlined Liner type: Thickness \_\_\_\_\_ mil  LLDPE  HDPE  PVC  Other \_\_\_\_\_  
 String-Reinforced  
Liner Seams:  Welded  Factory  Other \_\_\_\_\_ Volume: \_\_\_\_\_ bbl Dimensions: L \_\_\_\_\_ x W \_\_\_\_\_ x D \_\_\_\_\_

3.  
 **Below-grade tank:** Subsection I of 19.15.17.11 NMAC **OIL CONS. DIV DIST. 3**  
Volume: 164 bbl Type of fluid: Used Oil BGT (2) **JUN 12 2017**  
Tank Construction material: Steel  
 Secondary containment with leak detection  Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off  
 Visible sidewalls and liner  Visible sidewalls only  Other \_\_\_\_\_  
Liner type: Thickness 40 mil  HDPE  PVC  Other \_\_\_\_\_

4.  
 **Alternative Method:**  
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

5.  
**Fencing:** Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks)  
 Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence, school, hospital, institution or church)  
 Four foot height, four strands of barbed wire evenly spaced between one and four feet  
 Alternate. Please specify \_\_\_\_\_

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6. **Netting:** Subsection E of 19.15.17.11 NMAC (*Applies to permanent pits and permanent open top tanks*)

Screen  Netting  Other Solid Steel

Monthly inspections (If netting or screening is not physically feasible)

7. **Signs:** Subsection C of 19.15.17.11 NMAC

12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers

Signed in compliance with 19.15.16.8 NMAC

8. **Variations and Exceptions:**

Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.

**Please check a box if one or more of the following is requested, if not leave blank:**

Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.

Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

9. **Siting Criteria (regarding permitting):** 19.15.17.10 NMAC

**Instructions:** *The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.*

**General siting**

**Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.**

-  NM Office of the State Engineer - iWATERS database search;  USGS;  Data obtained from nearby wells

Yes  No  
 NA

**Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.**

NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

Yes  No  
 NA

Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. **(Does not apply to below grade tanks)**

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

Yes  No

Within the area overlying a subsurface mine. **(Does not apply to below grade tanks)**

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

Yes  No

Within an unstable area. **(Does not apply to below grade tanks)**

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

Yes  No

Within a 100-year floodplain. **(Does not apply to below grade tanks)**

- FEMA map

Yes  No

**Below Grade Tanks**

Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

Yes  No

Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

Yes  No

**Temporary Pit using Low Chloride Drilling Fluid** (maximum chloride content 15,000 mg/liter)

Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.)

- Topographic map; Visual inspection (certification) of the proposed site

Yes  No

Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

Yes  No

Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application.

NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

Yes  No

<p>Within 100 feet of a wetland.</p> <ul style="list-style-type: none"> <li>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><b><u>Temporary Pit Non-low chloride drilling fluid</u></b></p>	
<p>Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).</p> <ul style="list-style-type: none"> <li>- Topographic map; Visual inspection (certification) of the proposed site</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</p> <ul style="list-style-type: none"> <li>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application;</p> <ul style="list-style-type: none"> <li>- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 300 feet of a wetland.</p> <ul style="list-style-type: none"> <li>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><b><u>Permanent Pit or Multi-Well Fluid Management Pit</u></b></p>	
<p>Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).</p> <ul style="list-style-type: none"> <li>- Topographic map; Visual inspection (certification) of the proposed site</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</p> <ul style="list-style-type: none"> <li>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.</p> <ul style="list-style-type: none"> <li>- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 500 feet of a wetland.</p> <ul style="list-style-type: none"> <li>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No

10.

**Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist:** Subsection B of 19.15.17.9 NMAC

*Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.*

Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC

Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC

Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC

Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC

Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC

Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

Previously Approved Design (attach copy of design)    API Number: \_\_\_\_\_ or Permit Number: \_\_\_\_\_

11.

**Multi-Well Fluid Management Pit Checklist:** Subsection B of 19.15.17.9 NMAC

*Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.*

Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC

Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC

A List of wells with approved application for permit to drill associated with the pit.

Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC

Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC

Previously Approved Design (attach copy of design)    API Number: \_\_\_\_\_ or Permit Number: \_\_\_\_\_

12.

**Permanent Pits Permit Application Checklist:** Subsection B of 19.15.17.9 NMAC

**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
- Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- Climatological Factors Assessment
- Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
- Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
- Quality Control/Quality Assurance Construction and Installation Plan
- Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- Nuisance or Hazardous Odors, including H<sub>2</sub>S, Prevention Plan
- Emergency Response Plan
- Oil Field Waste Stream Characterization
- Monitoring and Inspection Plan
- Erosion Control Plan
- Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

13.

**Proposed Closure:** 19.15.17.13 NMAC

**Instructions:** Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.

- Type:  Drilling  Workover  Emergency  Cavitation  P&A  Permanent Pit  Below-grade Tank  Multi-well Fluid Management Pit  
 Alternative
- Proposed Closure Method:  Waste Excavation and Removal  
 Waste Removal (Closed-loop systems only)  
 On-site Closure Method (Only for temporary pits and closed-loop systems)  
 In-place Burial  On-site Trench Burial  
 Alternative Closure Method

14.

**Waste Excavation and Removal Closure Plan Checklist:** (19.15.17.13 NMAC) **Instructions:** Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.

- Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC
- Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)
- Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

15.

**Siting Criteria (regarding on-site closure methods only):** 19.15.17.10 NMAC

**Instructions:** Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Please refer to 19.15.17.10 NMAC for guidance.

Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	<input type="checkbox"/> Yes <input type="checkbox"/> No

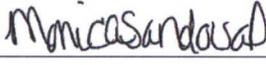
adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within a 100-year floodplain. - FEMA map	<input type="checkbox"/> Yes <input type="checkbox"/> No

16.  
**On-Site Closure Plan Checklist:** (19.15.17.13 NMAC) *Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.*

Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  
 Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC  
 Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.11 NMAC  
 Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC  
 Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC  
 Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC  
 Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC  
 Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)  
 Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  
 Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  
 Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

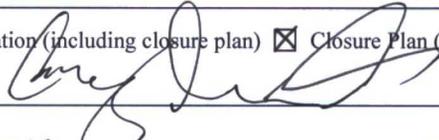
17.  
**Operator Application Certification:**  
 I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.

Name (Print): Monica Sandoval Title: Environmental Specialist

Signature:  Date: 6/7/2017

e-mail address: monica.sandoval@williams.com Telephone: 505-632-4625

18.  
**OCD Approval:**  Permit Application (including closure plan)  Closure Plan (only)  OCD Conditions (see attachment)

OCD Representative Signature:  Approval Date: 6/14/17

Title: Environmental Spec. OCD Permit Number: \_\_\_\_\_

19.  
**Closure Report (required within 60 days of closure completion):** 19.15.17.13 NMAC  
*Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.*

Closure Completion Date: \_\_\_\_\_

20.  
**Closure Method:**  
 Waste Excavation and Removal  On-Site Closure Method  Alternative Closure Method  Waste Removal (Closed-loop systems only)  
 If different from approved plan, please explain.

21.  
**Closure Report Attachment Checklist:** *Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached.*

Proof of Closure Notice (surface owner and division)  
 Proof of Deed Notice (required for on-site closure for private land only)  
 Plot Plan (for on-site closures and temporary pits)  
 Confirmation Sampling Analytical Results (if applicable)  
 Waste Material Sampling Analytical Results (required for on-site closure)  
 Disposal Facility Name and Permit Number  
 Soil Backfilling and Cover Installation  
 Re-vegetation Application Rates and Seeding Technique  
 Site Reclamation (Photo Documentation)

On-site Closure Location: Latitude \_\_\_\_\_ Longitude \_\_\_\_\_ NAD:  1927  1983

22.

**Operator Closure Certification:**

I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.

Name (Print): \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

e-mail address: \_\_\_\_\_ Telephone: \_\_\_\_\_

Variance Request #1:

Williams requests a variance request from Subsection E(1) of 19.15.17.13 New Mexico Administrative Code (NMAC) which states:

*The operator shall notify the surface owner by certified mail, return receipt requested that the operator plans closure operations at least 72 hours, but not more than one week, prior to any closure operation. Notice shall include well name, API number and location. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records is sufficient to demonstrate compliance with this requirement.*

The variance will allow Williams to notify public agencies such as the Bureau of Land Management (BLM), State of New Mexico, local government/municipalities, and/or tribal agencies via email based on their notification preferences

**Williams Four Corners LLC**  
**Closure Plan - Below Grade Tanks**

In accordance with Rule 19.15.17.13 NMAC of the New Mexico Administrative Code (NMAC), the information within this document describes the closure requirements to be used by Williams Four Corners LLC (Williams) when closing Below Grade Tanks (BGTs). This is Williams' standard procedure for all BGTs. A separate closure plan will be submitted for any BGT closure which does not conform to this plan.

Pit Rule Citation (NMAC)	Rule Requirement	Operator Requirements
19.15.17.13.A	Closure Plan	This plan describes Williams proposed closure methods and the proposed procedures and protocols to implement and complete BGT closure.
19.15.17.13.C(1)		Prior to commencing BGT closure, Williams will obtain a NMOCD approved closure plan before any closure activities start. Williams understands that the NMOCD considers the start of closure for a BGT is when the BGT is being removed from the ground.
19.15.17.13.C(2)		Williams will remove liquids and sludge from a BGT prior to commencing closure actions and will dispose the material in a NMOCD approved facility.
19.15.17.13.C.3(a)		Following removal of the tank and any liner material, Williams will test the soils beneath the BGT in accordance with 19.15.17.13.C.3(a) NMAC. Samples will be collected from beneath the liner and/or BGT for obvious stained or wet soils, or any other evidence of contamination.
19.15.17.13.C.3(b)		If any contaminant concentration is higher than the parameters listed in Table I of 19.15.17.13 NMAC, the NMOCD may require additional delineation upon review of the results and Williams must receive approval before proceeding with closure.
19.15.17.13.C.3(c)		Upon completion of BGT removal, if all contaminant concentrations are less than or equal to the parameters listed in Table I of 19.15.17.13 NMAC, the excavation will be backfilled with non-waste contained, uncontaminated, earthen material.
19.15.17.13.E(1)	Notification	Notice of closure will be given to the surface owner at least 72 hours, but not more than one week, prior to any closure operation via Certified mail. As a variance (if approved with the closure plan), surface owners which are public entities (State, BLM, or Tribal) will be notified by email or phone. The notification of closure will include the following: operators name, well name and API number (if applicable), and location (ULSTR).
19.15.17.13.E(2)		Notice of Closure will be given to the NMOCD office at least 72 hours, but not more than one week, prior to any closure operation via Certified mail. As a variance (if approved with the closure plan), the NMOCD district office will be notified by email or phone. The notification of closure will include the following: operators name, well name and API number (if applicable), and location (ULSTR).
19.15.17.13.F(1)	Reporting	Operator will send the NMOCD a closure report in accordance with 19.15.17.F(1) NMAC within 60 days of closure including the following items: Proof of closure notice, analytical results, backfill information, revegetation, and photo documentation of reclamation. Williams understands that the NMOCD considers the closure date the day in which the BGT is backfilled and re-contoured. Revegetation is still required but, may be addressed in closure report.
19.15.17.13.G.4(a)	Timing	Within 60 days of cessation of operations, Williams will remove liquids and sludge from a BGT prior to implementing a closure method and will dispose of the material in a NMOCD approved facility. Disposal facilities to be used by Williams are listed below based on the listed waste types.
19.15.17.13.G.4(b)		Within 6 months of cessation of operations, Williams will dispose, recycle, reuse, or reclaim the BGT in a NMOCD approved manner. If required, Williams will provide documentation of the disposition of the BGT to the NMOCD. Liner materials will be cleaned to remove soils or contaminated material for disposal as solid waste. Disposal facilities to be used by Williams are listed below based on the listed waste types.
19.15.17.13.H.1(a)	Reclamation	Williams will reclaim the area by substantially restoring the impacted surface area to the condition that existed prior to oil and gas operations by placement of soil cover as described below for 19.15.17.13.H.2 NMAC. The location and associated areas will be recontoured that approximates the original contour and blends with the surrounding topography and revegetate as described below for 19.15.17.13.H.5 NMAC.
19.15.17.13.H.1(b)		Williams will submit an alternative plan to be approved by the NMOCD and written approval from the surface owner before submitting the C-144 application.
19.15.17.13.H.1(c)		If a BGT is removed from an area where production operations will continue, the area will be reclaimed in such a way to minimize dust and erosion to the extent practicable.
19.15.17.13.H.2		Cover will include one foot of suitable material, with chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, to establish vegetation at the site, or the background thickness of topsoil, whichever is greater.
19.15.17.13.H.4		Williams will construct the soil cover to the existing grade to prevent ponding of water and erosion of the cover material.

**Williams Four Corners LLC  
Closure Plan - Below Grade Tanks**

Pit Rule Citation (NMAC)	Rule Requirement	Operator Requirements
19.15.17.13.H.5(a) 19.15.17.13.H.5(b) 19.15.17.13.H.5(c) 19.15.17.13.H.5(d) 19.15.17.13.H.5(e)	Reclamation	For those portions of the former BGT area no longer in use with the exception where production operations will continue, the area will be reclaimed as nearly as practicable to their original condition or their final land use. Reclamation will begin as early as practical. The areas will be maintained to minimize dust and topsoils placed and contoured to limit erosion control, maintain stability, and preserve surface-water flow patterns. Williams will seed the disturbed areas the first favorable growing season following closure of the BGT. Williams will comply with obligations imposed by other applicable federal or tribal agencies in which their re-vegetation and reclamation requirements provide equal or better protection of fresh water, human health and the environment. Williams will notify the NMOCD when reclamation and re-vegetation is complete.

Summary of Waste Materials and Disposal Facilities	
Waste Types	Disposal Facility
Steel Tank	San Juan County Landfill; Steel Recycling
Fiberglass Tank	San Juan County Landfill; Bondad Landfill; Re-use
Liner (cleaned – absent soil / sludge)	San Juan County Landfill; Bondad Landfill
Sludge	Envirotech; Industrial Ecosystems Inc.; T-N-T; Bondad Landfill
Liquids (Water / Hydrocarbons)	Basin Disposal; Key Energy; T-N-T
Contaminated Soil	Envirotech; Industrial Ecosystems Inc.; T-N-T; Bondad Landfill
Fencing / Miscellaneous	Re-use or Scrap

Table 1  
Closure Criteria for Soils Beneath Below Grade Tanks, Drying Pads Associated with Closed Loop Systems and Pits where contents are Removed

Depth Below Bottom of pit to ground water less than 10,000 mg/l	Constituent	Method	Limit**
≤50 feet	Chloride	EPA 300.0	600 mg/kg
	TPH	EPA SW-846 Method 418.1	100 mg/kg
	BTEX	EPA SW-846 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 8021B or 8260B	10 mg/kg
51 feet – 100 feet	Chloride	EPA 300.0	10,000 mg/kg
	TPH	EPA SW-846 Method 418.1	2,500 mg/kg
	GRO+DRO	EPA SW-846 Method 8015M	1,000 mg/kg
	BTEX	EPA SW-846 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 8021B or 8260B	10 mg/kg
≤100 feet	Chloride	EPA 300.0	20,000 mg/kg
	TPH	EPA SW-846 Method 418.1	2,500 mg/kg
	GRO+DRO	EPA SW-846 Method 8015M	1,000 mg/kg
	BTEX	EPA SW-846 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846	10 mg/kg

**SITING CRITERIA  
SUMMARY INFORMATION SHEET  
19.15.17.10 NMAC**



**LT Environmental Inc.**  
2243 Main Avenue, Suite 3  
Durango, Colorado 81301  
T 970-385-1096

**GENERAL INFORMATION**

<b>Site Name:</b>	32-8 #2 CDP	<b>Operator:</b>	Williams Four Corners LLC
<b>Pit Identifier:</b>	BGT 2	<b>Date</b>	3/15/2016
		<b>Prepared by:</b>	LT Environmental, Inc.

**GENERAL SITE LOCATION INFORMATION**

<b>Geologic Formation:</b>	San Jose	<b>SEC:</b>	27	<b>TWN:</b>	32 N	<b>RNG:</b>	8 W
<b>Soil Type:</b>	Buckle Silt Loam	<b>Latitude:</b>	36.956858	<b>Longitude:</b>	-107.663978		
<b>Annual Precipitation:</b>	Navajo Dam 12.87"						

**GENERAL SITING CRITERIA**

**Is groundwater less than 25 feet below the bottom of below grade tank? - No**

See Figure 3 and attached iWaters Data

**BELOW GRADE TANK SITING CRITERIA**

**Within 100 feet of a continuously flowing watercourse? - No**  
3.56 miles east to the Los Pinos River.

See Figure 1

**Within 100 feet of a significant watercourse? - No**  
555 feet east to a first order tributary of Jaquez Canyon.

See Figure 1 and Figure 3

**Within 100 feet of a lakebed, playa lake, or sinkhole? - No**  
1,705 feet southeast to a stock pond and 4,120 feet southwest to a stock pond

See Figure 2

**Within 200 horizontal feet of a spring or a freshwater well used for public or livestock consumption? - No**  
NA

See Figure 3 and attached iWaters data

**ATTACHED DOCUMENTS:**

Hydrogeologic Report  
Figure 1: Topographic Map  
Figure 2: Aerial Photograph  
Figure 3: Water Well and Surface Water Features  
iWaters Data

**ADDITIONAL COMMENTS:**

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## 32-8 #2 CDP Hydrogeologic Report for Siting Criteria

### General Geology and Hydrology

The San Juan Basin is a typical Rocky Mountain basin with a gently dipping southern flank and a steeply dipping northern flank. Asymmetrically layered Tertiary sandstones and shales, along with Quaternary alluvial deposits, dominate surficial geology. The below-grade tank is located near Pump Mesa, north of Navajo Dam, New Mexico. The predominant geologic formation is the San Jose Formation of Tertiary age, which underlies surface soils and is often exposed (Dane and Bachman, 1965). Deposits of Quaternary alluvial and aeolian sands occur prominently near the surface of the area, especially near streams and washes.

Cretaceous and Tertiary sandstones, as well as Quaternary alluvial deposits, serve as the primary aquifers in the San Juan Basin. In most of the area, the San Jose Formation lies at the surface and overlies the Nacimiento Formation. Thickness of the San Jose Formation ranges from 200 feet to 2,700 feet, thickening from west to east across the region of interest. Aquifers occur within the coarser and continuous sandstone bodies of the San Jose Formation, and groundwater within these aquifers flows toward the San Juan River. Little specific hydrogeologic data are available for the San Jose Formation system, but numerous wells and springs are used for stock and domestic supplies (Stone et al., 1983).

The prominent soil type at the below-grade tank are rock lands and aridisols, which are defined as soils that exhibit little to no profile development ([www.emnrd.state.nm.us](http://www.emnrd.state.nm.us)). Soils are basically unaltered from their parent rock. Miles of arroyos, washes, and intermittent streams exist as part of the drainage network toward the San Juan River. These features often cut into soil and other unconsolidated materials, contributing to sedimentation downstream. The sudden influx of water from storm events easily erodes the soils that cover the area and prohibits effective recharge to the underlying aquifers.

Dry and arid weather further prohibits active recharge. The climate of the region is arid, averaging just over 12.87 inches of rainfall annually. As is typical of the southwestern United States monsoonal weather patterns, most precipitation falls from August through October. The heaviest rainfall occurs in the summer in isolated, intense cloudbursts. November through June is relatively dry. Snow generally falls from December to mid-February and averages less than one-half inch in depth. However, most recharge occurs during the winter months during snowmelt periods from the upper elevations (Western Regional Climate Center [www.wrcc.dri.edu](http://www.wrcc.dri.edu)). The predominant vegetation are sagebrush and grasses with a more restricted pinon-juniper association (Dick-Peddie, 1993).



### **Site-Specific Hydrogeology**

Depth to groundwater is estimated to be greater than 100 feet beneath the below-grade tank. This estimation is based on data from Stone et al. (1983), the United States Geological Survey (USGS) *Groundwater Atlas of the United States*. Local topography and proximity to surface hydrologic features are taken into consideration. When available, permitted water well logs and cathodic protection well logs are referenced to infer depth to groundwater near the site.

Beds of water-yielding sandstone are present in the San Jose Formation, which are fluvial in origin and are interbedded with mudstone, siltstone, and shale. "Extensive intertonguing" of different members of this formation is reported. Porous sandstones form the principal aquifers, while relatively impermeable shales and mudstones form confining units between the aquifers. Most aquifers exist within the San Jose Formation at depths greater than 100 feet, and thicknesses of the aquifers can be up to several hundred feet (USGS, *Groundwater Atlas of the United States*; Stone et al., 1983).

The below-grade tank is located at an elevation of approximately 6,723 near the headwaters of Jaquez Canyon, a tributary of Pump Canyon. Regional topography of Pump Canyon is composed of mesas dissected by deep, narrow canyons and arroyos. The mesas are composed of cliff-forming sandstone, and systems of dry washes and their tributaries composed of alluvium are evident on the attached aerial image. Groundwater is expected to be shallow within the canyon and within the surrounding tributary systems. An elevation difference between the site and the primary channel of Jaquez Canyon of 150 feet suggests groundwater is greater than 100 feet deep beneath the below-grade tank.

Groundwater data available from the New Mexico State Engineer's iWaters database for wells near the site are attached. Groundwater data are sparse in this region; the nearest iWaters data points with similar topographical characteristics and have reported depths to groundwater information are well number SJ 02992 located approximately 0.25 miles to the southeast and SJ 03823 approximately 0.40 miles to the southeast. Depth to groundwater in the permitted water wells is 230 feet and 250 feet below ground surface respectively.

### **References**

Dane, C.H. and G. O. Bachman, 1965, *Geologic Map of New Mexico*: U.S. Geological Survey, 1 sheet, scale 1:500,000.

Dick-Peddie, W.A., 1993, *New Mexico Vegetation – Past, Present and Future*: Albuquerque, New Mexico, University of New Mexico Press, 244 p.



Stone, W.J., F.P. Lyford, P.F. Frenzel, N.H. Mizell, and E.T. Padgett, 1983, *Hydrogeology and Water Resources of the San Juan Basin, New Mexico*: HR-6 New Mexico Bureau of Geology and Mineral Resources Hydrology Report 6.

USGS, [Groundwater Atlas of the United States](http://www.pubs.usgs.gov): Arizona, Colorado, New Mexico, Utah, HA 730-C: (<http://www.pubs.usgs.gov>).

Western Region Climate Center, 2008, New Mexico climate summaries: Desert Research Institute at <http://www.wrcc.dri.edu/summary/climsmnm.html>.

New Mexico Energy, Minerals and Natural Resources Department, [www.emnrd.state.nm.us](http://www.emnrd.state.nm.us).

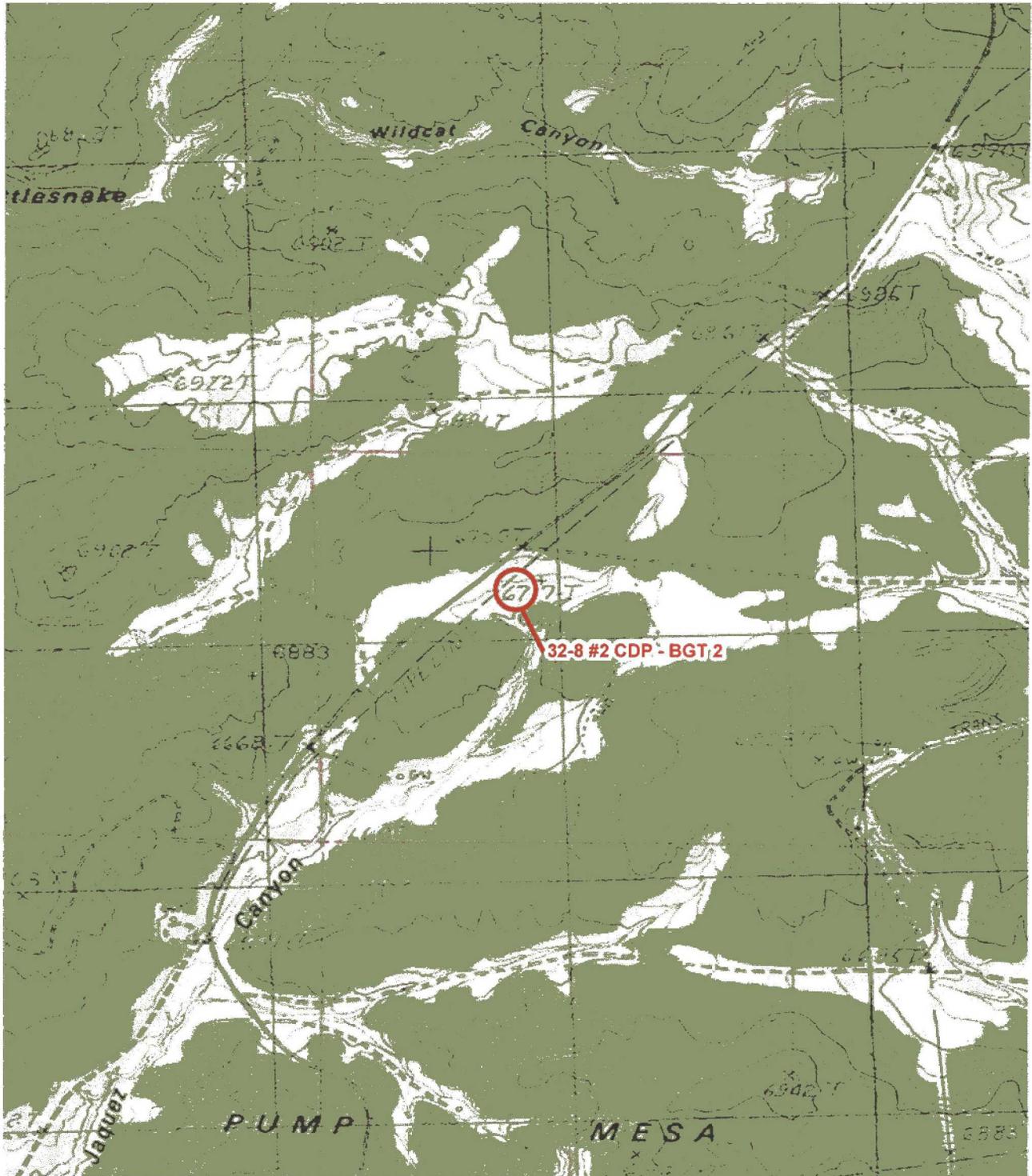
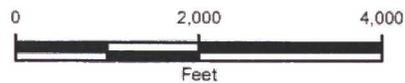


IMAGE COURTESY OF ESRI/USGS

**LEGEND**

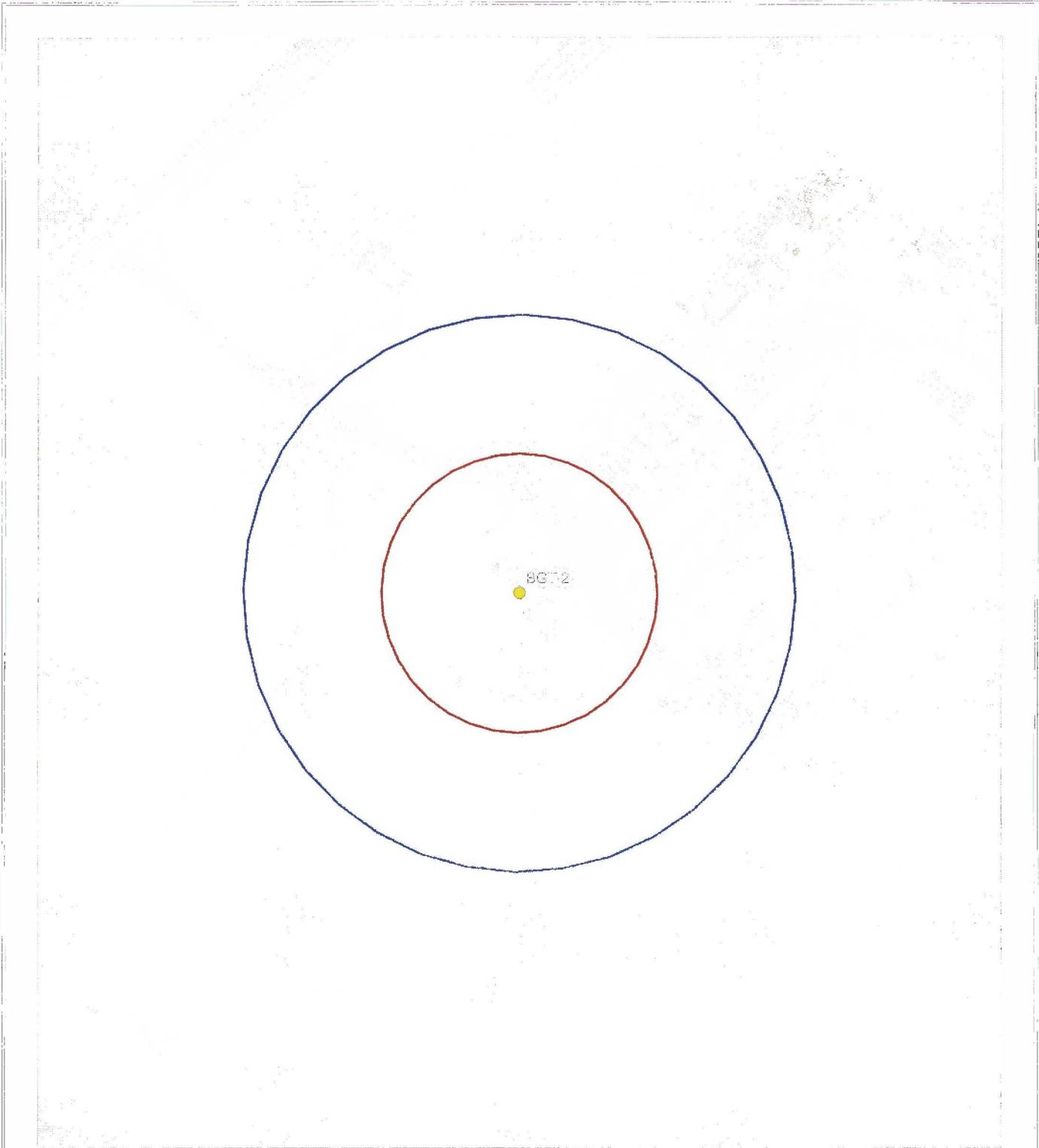
 SITE LOCATION

BGT: BELOW GRADE TANK



**FIGURE 1**  
**TOPOGRAPHIC MAP**  
**32-8 #2 CDP - BGT 2**  
**NW/SE (J) SEC 27 T32N R8W**  
**SAN JUAN COUNTY, NEW MEXICO**  
**WILLIAMS FOUR CORNERS**





LEGEND

-  BGT: BELOW GRADE TANK
-  100-FOOT RADIUS
-  200-FOOT RADIUS

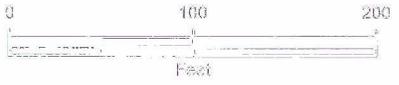


IMAGE COURTESY OF ESRI



FIGURE 2  
 AERIAL PHOTOGRAPHIC MAP  
 32-8 S2 CLM - BGT 2  
 NWSE (J) SEC 27 T32N R8W  
 SAN JUAN COUNTY, NEW MEXICO  
 WILLIAMS FOUR CORNERS



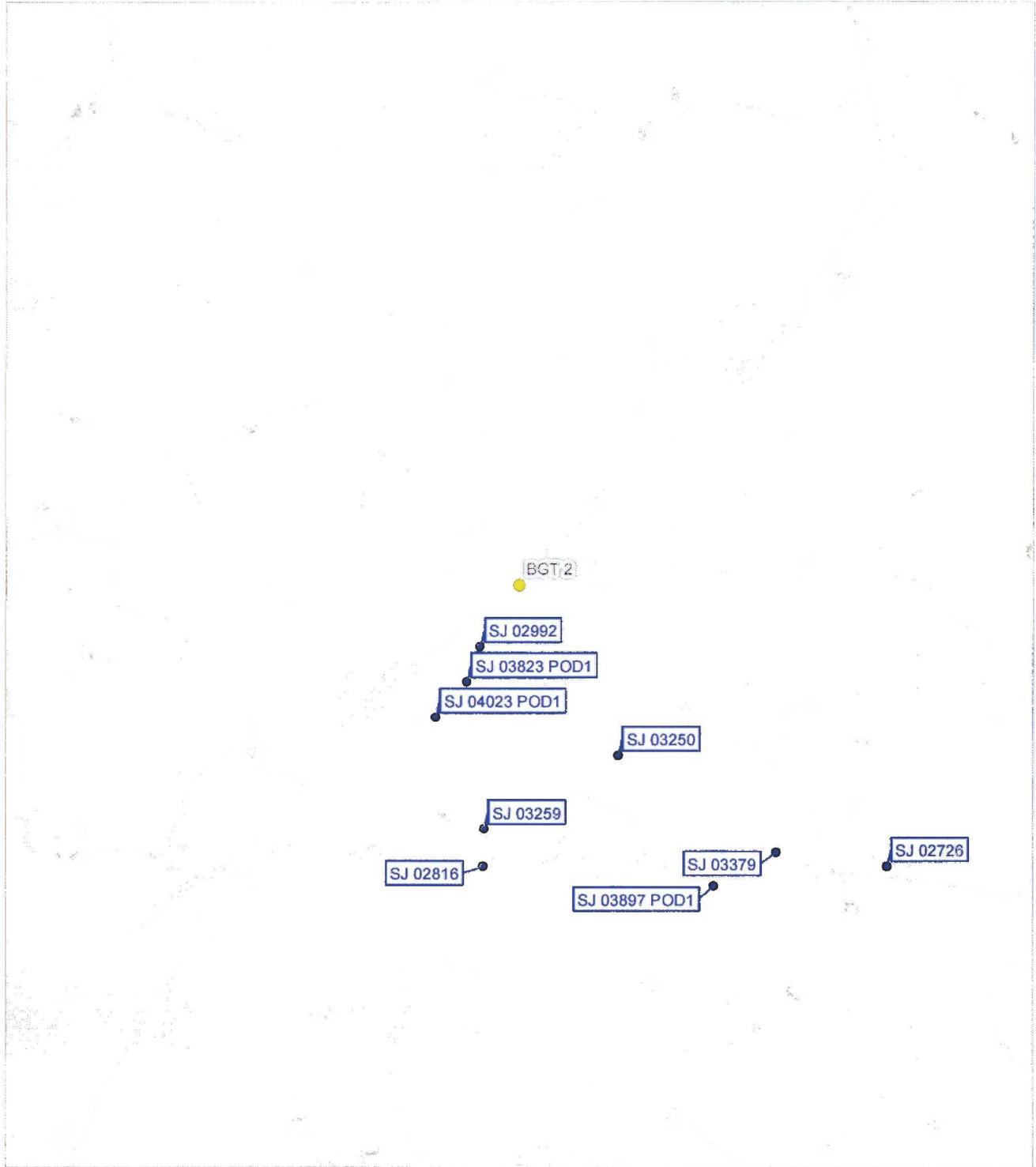
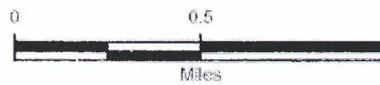


IMAGE COURTESY OF ESRI

**LEGEND**

- WATER WELL
- BGT; BELOW GRADE TANK



**FIGURE 3**  
**WATER WELL MAP**  
 32-8 #2 CDP - BGT 2  
 NW/SE (J) SEC 27 T32N R8W  
 SAN JUAN COUNTY, NEW MEXICO  
**WILLIAMS FOUR CORNERS**





# New Mexico Office of the State Engineer

## Water Column/Average Depth to Water

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)

(R=POD has been replaced, O=orphaned, C=the file is closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest) (NAD83 UTM in meters)

(In feet)

POD Number	POD Sub-Code	basin	County	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	Depth Well	Depth Water	Water Column
<a href="#">SJ 02992</a>			SJ	1	2	3	27	32N	08W	262631	4093068*	330	230	100
<a href="#">SJ 03250</a>			SJ	4	3	4	27	32N	08W	263222	4092454*	400	375	25
<a href="#">SJ 03823</a>	POD1		SJ	3	2	3	27	32N	08W	262567	4092875	380	250	130

Average Depth to Water: **285 feet**

Minimum Depth: **230 feet**

Maximum Depth: **375 feet**

**Record Count:** 3

**PLSS Search:**

**Section(s):** 27

**Township:** 32N

**Range:** 08W

\*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.



Hall Environmental Analysis Laboratory  
4901 Hawkins NE  
Albuquerque, NM 87109  
TEL: 505-345-3975 FAX: 505-345-4107  
Website: [www.hallenvironmental.com](http://www.hallenvironmental.com)

August 25, 2016

Matt Webre  
Williams Four Corners  
188 CR 4900  
Bloomfield, NM 87413  
TEL: (505) 632-4442  
FAX

RE: 32-8 2 Lube Oil Release

OrderNo.: 1608B48

Dear Matt Webre:

Hall Environmental Analysis Laboratory received 1 sample(s) on 8/19/2016 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to [www.hallenvironmental.com](http://www.hallenvironmental.com) or the state specific web sites. In order to properly interpret your results it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifiers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

A handwritten signature in black ink, appearing to read 'Andy Freeman', is written over a white background.

Andy Freeman  
Laboratory Manager  
4901 Hawkins NE  
Albuquerque, NM 87109

**Hall Environmental Analysis Laboratory, Inc.**

**CLIENT:** Williams Four Corners  
**Project:** 32-8 2 Lube Oil Release  
**Lab ID:** 1608B48-001

**Matrix:** SOIL

**Client Sample ID:** 38-2 #2 Lube Oil Release  
**Collection Date:** 8/18/2016 1:15:00 PM  
**Received Date:** 8/19/2016 7:30:00 AM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
<b>FREE LIQUID/PAINT FILTER</b>							Analyst: <b>JRR</b>
Free Liquid	Negative			Pos/Neg	1	8/23/2016 4:28:00 PM	R36692
<b>MERCURY, TCLP</b>							Analyst: <b>pmf</b>
Mercury	ND	0.020		mg/L	1	8/24/2016 8:36:50 AM	27116
<b>EPA METHOD 6010B: TCLP METALS</b>							Analyst: <b>MED</b>
Arsenic	ND	5.0		mg/L	1	8/24/2016 9:23:25 AM	27118
Barium	ND	100		mg/L	1	8/24/2016 9:23:25 AM	27118
Cadmium	ND	1.0		mg/L	1	8/24/2016 9:23:25 AM	27118
Chromium	ND	5.0		mg/L	1	8/24/2016 9:23:25 AM	27118
Lead	ND	5.0		mg/L	1	8/24/2016 9:23:25 AM	27118
Selenium	ND	1.0		mg/L	1	8/24/2016 9:23:25 AM	27118
Silver	ND	5.0		mg/L	1	8/24/2016 9:23:25 AM	27118

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

<b>Qualifiers:</b>	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	D	Sample Diluted Due to Matrix	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
	S	% Recovery outside of range due to dilution or matrix	W	Sample container temperature is out of limit as specified

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1608B48  
25-Aug-16

**Client:** Williams Four Corners  
**Project:** 32-8 2 Lube Oil Release

Sample ID	<b>MB-27116</b>	SampType:	<b>MBLK</b>	TestCode:	<b>MERCURY, TCLP</b>					
Client ID:	<b>PBW</b>	Batch ID:	<b>27116</b>	RunNo:	<b>36703</b>					
Prep Date:	<b>8/23/2016</b>	Analysis Date:	<b>8/24/2016</b>	SeqNo:	<b>1137246</b>	Units:	<b>mg/L</b>			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Mercury	ND	0.020								

Sample ID	<b>LCS-27116</b>	SampType:	<b>LCS</b>	TestCode:	<b>MERCURY, TCLP</b>					
Client ID:	<b>LCSW</b>	Batch ID:	<b>27116</b>	RunNo:	<b>36703</b>					
Prep Date:	<b>8/23/2016</b>	Analysis Date:	<b>8/24/2016</b>	SeqNo:	<b>1137248</b>	Units:	<b>mg/L</b>			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Mercury	ND	0.020	0.005000	0	97.6	80	120			

Sample ID	<b>1608B48-001AMS</b>	SampType:	<b>MS</b>	TestCode:	<b>MERCURY, TCLP</b>					
Client ID:	<b>38-2 #2 Lube Oil Rel</b>	Batch ID:	<b>27116</b>	RunNo:	<b>36703</b>					
Prep Date:	<b>8/23/2016</b>	Analysis Date:	<b>8/24/2016</b>	SeqNo:	<b>1137251</b>	Units:	<b>mg/L</b>			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Mercury	ND	0.020	0.005000	0	97.9	75	125			

Sample ID	<b>1608B48-001AMSD</b>	SampType:	<b>MSD</b>	TestCode:	<b>MERCURY, TCLP</b>					
Client ID:	<b>38-2 #2 Lube Oil Rel</b>	Batch ID:	<b>27116</b>	RunNo:	<b>36703</b>					
Prep Date:	<b>8/23/2016</b>	Analysis Date:	<b>8/24/2016</b>	SeqNo:	<b>1137253</b>	Units:	<b>mg/L</b>			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Mercury	ND	0.020	0.005000	0	97.2	75	125	0	20	

**Qualifiers:**

- \* Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

# QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1608B48

25-Aug-16

**Client:** Williams Four Corners  
**Project:** 32-8 2 Lube Oil Release

Sample ID: <b>MB-27118</b>	SampType: <b>MBLK</b>	TestCode: <b>EPA Method 6010B: TCLP Metals</b>
Client ID: <b>PBW</b>	Batch ID: <b>27118</b>	RunNo: <b>36699</b>
Prep Date: <b>8/23/2016</b>	Analysis Date: <b>8/24/2016</b>	SeqNo: <b>1137189</b> Units: <b>mg/L</b>

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Arsenic	ND	5.0								
Barium	ND	100								
Cadmium	ND	1.0								
Chromium	ND	5.0								
Lead	ND	5.0								
Selenium	ND	1.0								
Silver	ND	5.0								

Sample ID: <b>LCS-27118</b>	SampType: <b>LCS</b>	TestCode: <b>EPA Method 6010B: TCLP Metals</b>
Client ID: <b>LCSW</b>	Batch ID: <b>27118</b>	RunNo: <b>36699</b>
Prep Date: <b>8/23/2016</b>	Analysis Date: <b>8/24/2016</b>	SeqNo: <b>1137191</b> Units: <b>mg/L</b>

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Arsenic	ND	5.0	0.5000	0	88.4	80	120			
Barium	ND	100	0.5000	0	83.9	80	120			
Cadmium	ND	1.0	0.5000	0	88.7	80	120			
Chromium	ND	5.0	0.5000	0	84.3	80	120			
Lead	ND	5.0	0.5000	0	81.7	80	120			
Selenium	ND	1.0	0.5000	0	86.4	80	120			
Silver	ND	5.0	0.1000	0	92.0	80	120			

**Qualifiers:**

- \* Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1608B48  
25-Aug-16

**Client:** Williams Four Corners  
**Project:** 32-8 2 Lube Oil Release

Sample ID	1608B48-001BDUP	SampType:	DUP	TestCode:	FREE LIQUID/PAINT FILTER					
Client ID:	38-2 #2 Lube Oil Rel	Batch ID:	R36692	RunNo:	36692					
Prep Date:		Analysis Date:	8/23/2016	SeqNo:	1136898	Units:	Pos/Neg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Free Liquid	Negative									

**Qualifiers:**

- |   |   |
|---|---|
| * Value exceeds Maximum Contaminant Level.              | B Analyte detected in the associated Method Blank           |
| D Sample Diluted Due to Matrix                          | E Value above quantitation range                            |
| H Holding times for preparation or analysis exceeded    | J Analyte detected below quantitation limits                |
| ND Not Detected at the Reporting Limit                  | P Sample pH Not In Range                                    |
| R RPD outside accepted recovery limits                  | RL Reporting Detection Limit                                |
| S % Recovery outside of range due to dilution or matrix | W Sample container temperature is out of limit as specified |



Hall Environmental Analysis Laboratory  
 4901 Hawkins NE  
 Albuquerque, NM 87109  
 TEL: 505-345-3975 FAX: 505-345-4107  
 Website: www.hallenvironmental.com

# Sample Log-In Check List

Client Name: WILLIAMS FOUR CORN

Work Order Number: 1608B48

RcptNo: 1

Received by/date: AG 08/19/16

Logged By: Ashley Gallegos 8/19/2016 7:30:00 AM AG

Completed By: Ashley Gallegos 8/19/2016 8:37:07 AM AG

Reviewed By: JC 08/19/16

**Chain of Custody**

- 1. Custody seals intact on sample bottles? Yes  No  Not Present
- 2. Is Chain of Custody complete? Yes  No  Not Present
- 3. How was the sample delivered? Courier

**Log In**

- 4. Was an attempt made to cool the samples? Yes  No  NA
- 5. Were all samples received at a temperature of >0° C to 6.0°C Yes  No  NA
- 6. Sample(s) in proper container(s)? Yes  No
- 7. Sufficient sample volume for indicated test(s)? Yes  No
- 8. Are samples (except VOA and ONG) properly preserved? Yes  No
- 9. Was preservative added to bottles? Yes  No  NA
- 10. VOA vials have zero headspace? Yes  No  No VOA Vials
- 11. Were any sample containers received broken? Yes  No
- 12. Does paperwork match bottle labels? Yes  No   
(Note discrepancies on chain of custody)
- 13. Are matrices correctly identified on Chain of Custody? Yes  No
- 14. Is it clear what analyses were requested? Yes  No
- 15. Were all holding times able to be met? Yes  No   
(If no, notify customer for authorization.)

# of preserved bottles checked for pH: \_\_\_\_\_  
 (<2 or >12 unless noted)  
 Adjusted? \_\_\_\_\_  
 Checked by: \_\_\_\_\_

**Special Handling (if applicable)**

- 16. Was client notified of all discrepancies with this order? Yes  No  NA

Person Notified: \_\_\_\_\_ Date: \_\_\_\_\_  
 By Whom: \_\_\_\_\_ Via:  eMail  Phone  Fax  In Person  
 Regarding: \_\_\_\_\_  
 Client Instructions: \_\_\_\_\_

17. Additional remarks:

**18. Cooler Information**

Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	2.1	Good	Yes			

# Chain-of-Custody Record

Turn-Around Time: 8/25/16

Standard  Rush

Project Name: 32-8 #2 Lube Oil Release

Project #: UP151866

Project Manager: Devin Henemann

Sampler: Devin Henemann

On Ice:  Yes  No

Sample Temperature: 2.1

Client: Williams Four Corners LLC

Analyst: Matt Webre

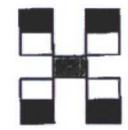
Billing Address: 1755 Arroyo Dr  
Room Field, NM 87413  
Phone: 505 632-4442

Email or Fax#: Matt.Webre@Williams.com

QC Package:  
Standard  Level 4 (Full Validation)

Creditation:  
NELAP  Other \_\_\_\_\_

EDD (Type): \_\_\_\_\_



## HALL ENVIRONMENTAL ANALYSIS LABORATORY

www.hallenvironmental.com  
4901 Hawkins NE - Albuquerque, NM 87109  
Tel. 505-345-3975 Fax 505-345-4107

### Analysis Request

Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL No.	BTEX + MTBE + TMB's (8021)	BTEX + MTBE + TPH (Gas only)	TPH 8015B (GRO / DRO / MRO)	TPH (Method 418.1)	EDB (Method 504.1)	PAH's (8310 or 8270 SIMS)	RCRA 8 Metals TCLP	Anions (F, Cl, NO <sub>3</sub> , NO <sub>2</sub> , PO <sub>4</sub> , SO <sub>4</sub> )	8081 Pesticides / 8082 PCB's	8260B (VOA)	8270 (Semi-VOA)	Paint Filter	Air Bubbles (Y or N)
8/16	1315	Soil	32-8 #2 Lube Oil Release	Various	CoCl	11208B48-001							X					X	

Relinquished by: [Signature] Date: 8/16/16 Time: 1547

Received by: [Signature] Date: 8/19/16 Time: 0730

Remarks: Please forward Results to dhenemann@henu.com

If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report.

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-141  
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

**Release Notification and Corrective Action**

**OPERATOR**

Initial Report  Final Report

Name of Company Williams Four Corners LLC	Contact Matt Webre
Address 1755 Arroyo Drive, Bloomfield, NM 87413	Telephone No. 505-632-4442
Facility Name 32-8 #2	Facility Type Compressor Station

Surface Owner Private	Mineral Owner NA	API No. NA
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**LOCATION OF RELEASE**

Unit Letter J	Section 27	Township 32N	Range 8W	Feet from the	North/South Line	Feet from the	East/West Line	County San Juan
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Latitude 36.956845 Longitude -107.663938

**NATURE OF RELEASE**

Type of Release Lube Oil	Volume of Release 500 gallons	Volume Recovered 0 gallons
Source of Release Tank Sight Glass	Date and Hour of Occurrence 08/01/2016, 08:00 AM	Date and Hour of Discovery 08/01/2016, 08:00 AM
Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

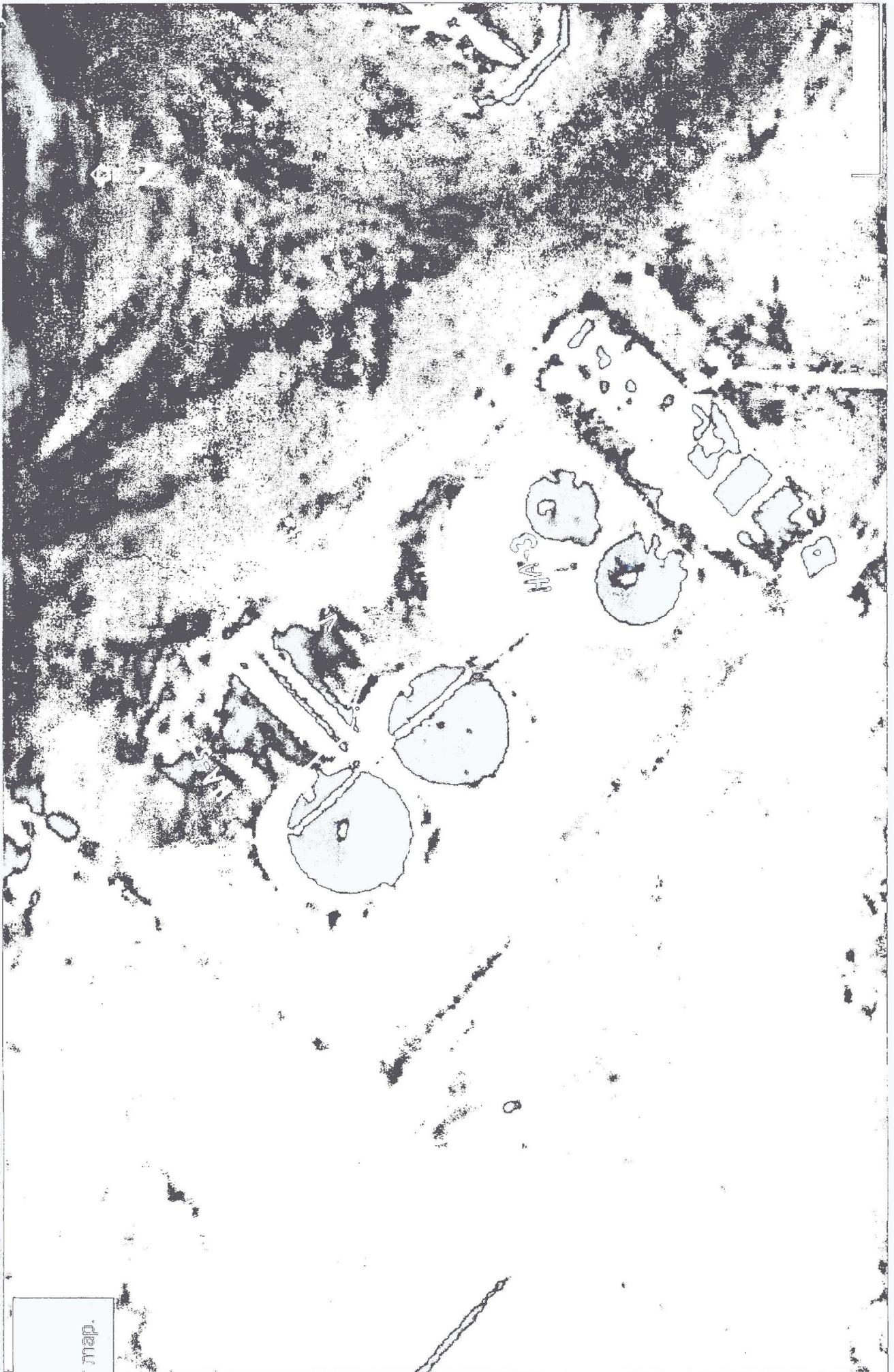
Describe Cause of Problem and Remedial Action Taken.\*  
A sight glass broke on a bulk lube oil storage tank. The lube oil was contained within the secondary containment area. The containment is unlined. The initial reported release volume was reported to be below 5 bbls. An investigation was performed by LT Environmental on August 18, 2016. Following completion of the investigation, it was determined that the volume of lube oil released was approximately 500 gallons. The cause of the sight glass break is unknown.

Describe Area Affected and Cleanup Action Taken.\*  
The attached figure documents the extent of the visible lube oil impacts during completion of the investigation. Seven hand auger borings (HA-1 through HA-7) were completed to evaluate the extent of impacts. It appears that heavy precipitation events following the release may have contributed to further migration of visible lube oil impacts within containment. The hand auger borings indicated the presence of a clay layer 19-inches below the containment floor that was non-impacted (impacts observed in soils above 19-inches). Remediation activities will be completed in the future to remove impacted soils from the containment. Confirmation soil samples from the excavation floor and sidewalls will be collected to demonstrate cleanup concentrations are achieved.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: 	<b>OIL CONSERVATION DIVISION</b>		
Printed Name: Matt Webre	Approved by Environmental Specialist:		
Title: Environmental Specialist	Approval Date:	Expiration Date:	
E-mail Address: matt.webre@williams.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 9/8/2016	Phone: 505-632-4442		

\* Attach Additional Sheets If Necessary



map.

## Webre, Matt

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**From:** Webre, Matt  
**Sent:** Friday, August 19, 2016 3:51 PM  
**To:** Jackson, Steve; Sandoval, Monica; Price, Andy  
**Subject:** FW: 32-8 #2 subsurface investigation summary  
**Attachments:** 32-8 2 COC.PDF; HA-2 SE looking NW.JPG; 32-8 #2 MAP.PDF; 32-8 #2 N looking S.JPG; 32-8 #2 N looking S\_2.jpg; 32-8 #2 NW looking SE.JPG; 32-8 #2 NW looking SE\_2.jpg; 32-8 #2 SW looking NE.JPG; HA-1 SE looking NW.JPG

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**From:** Devin Hencmann [mailto:dhencmann@ltenv.com]  
**Sent:** Friday, August 19, 2016 11:52 AM  
**To:** Webre, Matt <Matt.Webre@Williams.com>  
**Cc:** Brooke Herb <bherb@ltenv.com>  
**Subject:** 32-8 #2 subsurface investigation summary

Matt,

This email is a summary of the findings at the 32-8 #2 on 8/18/2016.

Seven handauger boreholes were conducted.

One waste profile sample was collected and submitted to Hall Analytical to be analyzed for **TCLP Metals, and paint filter**, 1-week turnaround (see attached COC).

I have attached a hand drawn map and photos to reference.

No OVM readings above 5ppm were observed. Visual and Odor observations were used to assess impacted soil.

Handauger summary:

HA-1 TD=24 inches

0"-14" bgs Gravel

14"- 24" bgs Silty Clay, Med plasticity

Lube oil impacted soil was observed from 0" - 19" bgs

Clay from 19" - 24" bgs did not appear impacted

HA-2 TD=24 inches

0"-14" bgs Gravel

14"- 24" bgs Silty Clay, Med plasticity

Lube oil impacted soil was observed from 0" - 19" bgs

Clay from 19" - 24" bgs did not appear impacted

HA-3 TD=24 inches

0"-14" bgs Gravel

14"- 24" bgs Silty Clay, Med plasticity

Lube oil impacted soil was observed from 0" - 19"

Clay from 19" – 24" bgs did not appear impacted

HA-4 TD=20 inches

0"-12" bgs Sandy Silt (sediment that has washed into BGT containment)

12" - 20" bgs Gravel

Impacted soil observed from 0"-20" bgs

Standing liquid encountered at 12" - 20" bgs (mix of oil and water)

Liquid consisted of almost entirely lube oil.

HA-5 TD=20 inches

0"-12" bgs Sandy Silt (sediment that has washed into BGT containment)

12" - 20" bgs Gravel

Impacted soil observed from 12"-20" bgs

Standing liquid encountered at 12" bgs (mix of oil and water)

Liquid contained more rain water than oil

HA-6 TD=30 inches

0"-12" bgs Sandy Silt (sediment that has washed into BGT containment)

12" - 24" bgs Gravel

24" - 30" bgs Silty Clay, Med placticity

Impacted soil observed 12" - 26" bgs

Standing liquid encountered 12" - 24" bgs (mix of water and oil)

Liquid contained more rain water than oil

Clay did not appear saturated at 30"

HA-7 TD=9 feet

0" – 6" bgs silty sand

6" – 9' bgs Clay to silty clay, med to high placticity

No impact was observed from 0" – 9' bgs

9' bgs in this location is approximately 24" below the bottom of the BGT containment

Let me know if you have any questions or if you would like a summary in a different format. I also have more photos if you would like to see any of them let me know.

Thank you,  
Devin Hencmann

Devin Hencmann  
Project Geologist



COMPLIANCE / ENGINEERING / REMEDIATION

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Durango, CO 81301  
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[dhencmann@ltenv.com](mailto:dhencmann@ltenv.com)



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Please consider the environment before printing this e-mail.